

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE: SUFFOLK UNIVERSITY COVID  
REFUND LITIGATION

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Master File No.: 1:20-cv-10985-WGY

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

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**JOINT MOTION TO EXTEND DEADLINES AND REVISE  
BRIEFING SCHEDULES ON MOTION FOR SUMMARY JUDGMENT  
AND MOTION FOR CLASS CERTIFICATION**

Plaintiffs and Defendant (collectively “Parties”), jointly move to briefly extend the deadlines for Plaintiffs to file their opposition to Defendant’s Motion for Summary Judgment by fourteen (14) days from April 11, 2022 to April 25, 2022, for Defendant to file its opposition to Plaintiffs’ Motion for Class Certification by fourteen (14) days from April 21, 2022 to May 5, 2022, and for the reply deadlines on both motions to be correspondingly extended by fourteen (14) days. The parties’ request would revise the briefing schedule on these motions as follows:

- April 25, 2022: Plaintiffs’ Opposition to Defendant’s Motion for Summary Judgment due (from April 11)
- May 5, 2022: Defendant’s Opposition to Plaintiffs’ Motion for Class Certification due (from April 21)
- May 9, 2022: Defendant’s Reply In Support Of Defendant’s Motion for Summary Judgment due (from April 25)
- May 23, 2022: Plaintiffs’ Reply in Support of Plaintiffs’ Motion for Class Certification (from May 9)

Good cause exists for the requested extension and briefing schedule revision. Counsel have been working diligently to meet these deadlines but require more time due to several scheduling conflicts. In addition, these motions involve multiple issues, some of which are complex, as well as substantial factual analysis. The supporting papers for the Motion for Summary Judgment [ECF 119] include 8 affidavits and 59 items requiring individual response in the Statement of Undisputed Material Facts [ECF 121]. The supporting papers for the Motion for Class Certification [ECF 112], in turn, include 10 exhibits, several declarations, and a multitude of issues requiring detailed fact-gathering and responses.

WHEREFORE, for the reasons set forth above, the Parties respectfully request a brief, 14-day extension of the opposition and reply papers for the Motion for Summary Judgment and Motion for Class Certification.

Dated: April 8, 2022

Respectfully submitted,

/s/David Pastor

David Pastor (BBO # 391000)

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 8, 2022.

/s/ David Pastor  
David Pastor